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Standing up for Hertfordshire's countryside

Ben Glover
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

3rd September 2025 (by email)

Dear Ben Glover,

Planning application no. 25/01708/OP
Land opposite Heath Farm, Briary Lane, Royston
Erection of up to 84 dwellings with public open space, landscaping and sustainable drainage
system (SuDS) following demolition of No. 24 Echo Hill
with all matters reserved save for access

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The use of land identified for this proposed development is affected by the adopted North Herts Council Local Plan: Policy CGB1 (Rural Areas beyond the Green Belt) which is identified on the Proposals Map. Paragraph 6.1 of the Local Plan CGB1 states: "These areas do not meet the necessary criteria to be designated as Green Belt, but it is still necessary to impose restraints on development to prevent inappropriate schemes".
2. Policy CGB1 identifies six categories of development where:
"planning permission will be granted where the development:
 - a. is infill within the built core of a Category B village;
 - b. meets a proven local need for community facilities and services or rural housing;
 - c. is strictly necessary for the needs of agriculture or forestry;
 - d. relates to an existing rural building;
 - e. is a modest proposal for rural development or diversification; or
 - f. would provide land or facilities for outdoor sport, outdoor recreation and cemeteries that respect the generally open nature of the rural area."
3. Clearly, the proposed speculative residential development satisfies none of the above criteria and should be regarded as inappropriate. There is very significant local community opposition to this proposed development in the Rural Area in open countryside which is in agricultural use and widely used by local people for walking and informal recreation.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO

Chairman: Peter Waine, OBE

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4. The Applicant quotes a housing land supply of 3.9 years as a reason to involve the 'tilted balance' toward sustainable development and this is a serious misinterpretation of Government guidance. Notwithstanding the revised National Planning Policy Framework (NPPF) regarding maintaining a five year supply, the North Herts Local Plan is presently being reviewed and any further allocations of land for development in the Rural Area should be made following robust application of criteria rather than through speculative development applications.
5. The agricultural land comprising the site is graded as 2 and 3a by DEFRA and this constitutes Best and Most Versatile land. There is increasing concern regarding national food security and the use of productive agricultural land for development purposes should only take place in exceptional circumstances. CPRE Hertfordshire believes that the present use of the land for agriculture should be maintained in line with NPPF paragraph 187 b) and footnote 65 whereby planning decisions should recognise the 'economic and other benefits of the best and most versatile agricultural land'.
6. The Applicant's assertion that the context has changed with regard to the pressure for development is refuted. To the extent that the context has changed, it is to recognise the growing concerns of local rural communities in the continuing use of the open countryside for inappropriate and unsustainable development.
7. There are very significant short-comings in the application regarding a wide range of biodiversity issues. These relate to inadequate and inaccurate surveys relating to natural habitats, and protected species and constitute a major weakness of the application.
8. Further, the proximity of the Site of Special Scientific Interest and Local Wildlife Sites. should be taken fully into account as required by the NPPF (paragraphs 192 and 193). Such sites are highly vulnerable to increased trampling, dust and pollution during construction and other pressures associated with the proposed increase in the number of local houses, and to suggest that there would be no direct impacts is not credible.
9. CPRE Hertfordshire has responded twice previously to proposed development on this site and supports fully the Council's previous refusals of planning permission, most recently in 2021. The first reason for refusal on 13th April 2021 noted:
"the combination of residential built form on high ground and the associated urbanising infrastructure, and development breaking the skyline, would act to occasion a marked and adverse change in the character of the immediate an intermediate locality and wider valued landscape".



10. Nothing in the present application has affected the basic principle established in the primary reason for refusal to both previous applications on this site. As noted above, CPRE Hertfordshire supports fully the Council and the local communities in their opposition to this application and deplores the Applicant's continued attempts to promote this damaging proposed development.
11. Hertfordshire is under unrelenting pressure for development and the value of the high quality open countryside that remains increases for local communities and visitors, together with the wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health. We urge the Council to continue to refuse permission for this highly inappropriate speculative development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.